

CLARK SMITH VILLAZOR

Clark Smith Villazor LLP
250 West 55th Street, 30th Floor
New York, NY 10019
www.csvllp.com

RODNEY VILLAZOR
T 212 582 4400
rodney.villazor@csvllp.com

May 19, 2023

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*
Proposed Modification of Pretrial Release Order

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to modify his bail conditions to allow him to attend the birthday party of his son at a local venue on May 30, 2023. The time and location of the party shall be disclosed to and approved by Pretrial Services. Mr. Goetsche will be accompanied by a third-party custodian at the birthday party.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goetsche to remain under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkts 187, 193, 225, 229, 251, 257, 270 and 281). The Court previously denied a motion to modify bail conditions (dkt. 268).

Pretrial Services has no objection to this proposed request. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
CLARK SMITH VILLAZOR LLP

Addressée

May 19, 2023

Page Two

cc: Matthew Menchel, Esq.
Sean Buckley, Esq.
Carolina Leung, Esq.
Government counsel of record (via ECF and e-mail)
U.S. Pretrial Services Officer David Hernandez (via e-mail)
U.S. Pretrial Services Officer Barbara Hutchingson (via e-mail)
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)